



July 12, 2023

VIA ECF ONLY

Honorable Paul G. Gardephe, U.S.D.J.
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 705
New York, New York 10007

Re: *80 West End Ave. Leasehold Condominium v. Citizens Ins. Co. of Am., et al.*
Civil Action No.: 1:21-cv-05917-PGG

Dear Judge Gardephe:

We represent the Plaintiff, 80 West End Ave. Leasehold Condominium ("Plaintiff") with respect to the above-referenced matter. We write to Your Honor seeking a two (2) week extension of the deadline to commence summary judgment practice on or before July 14, 2023 pursuant to Your Honor's Order dated July 12, 2023 (Docket No. 34). This is the first request for an extension of time to commence summary judgment pre-motion practice deadline.

However, the undersigned counsel has encountered unanticipated scheduling conflicts in various other matters preventing Plaintiff from meeting this initial deadline. Plaintiff's counsel has conferred with counsel for Defendant, Mr. Edward Hagan, Esq. regarding this request and he has consented to the short extension.

The parties agree that this request is not made for the purpose of delay, but to ensure a just adjudication of the case on the merits, and that none of them will be prejudiced by the requested extension.

Should Your Honor have any questions, please feel free to contact the undersigned. We thank the Court for its time and attention to this matter.

MEMO ENDORSED: The application is granted. The parties' pre-motion letters regarding summary judgment are due by July 28, 2023. The Clerk of Court is directed to terminate the motion (Dkt. No. 35).
SO ORDERED.

Respectfully submitted,

By: /s/Amanda Peterson
Amanda Peterson, Esq.

Paul G. Gardephe
United States District Judge
Dated: July 14, 2023

LERNER, ARNOLD & WINSTON, LLP